

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

DAILY NEWS, LP; CHICAGO TRIBUNE
COMPANY, LLC; ORLANDO SENTINEL
COMMUNICATIONS COMPANY, LLC;
SUN-SENTINEL COMPANY, LLC; SAN
JOSE MERCURY-NEWS, LLC; DP MEDIA
NETWORK, LLC; ORB PUBLISHING, LLC;
AND NORTHWEST PUBLICATIONS, LLC,

Plaintiffs,

v.

MICROSOFT CORPORATION; OPENAI,
INC.; OPENAI LP; OPENAI GP, LLC;
OPENAI, LLC; OPENAI OPCO, LLC;
OPENAI GLOBAL, LLC; OAI
CORPORATION, LLC; and OPENAI
HOLDINGS, LLC,

Defendants.

Case No. 1:24-cv-03285-SHS

NOTICE OF MOTION TO ADMIT COUNSEL *PRO HAC VICE*

Pursuant to Rule 1.3 (c) of the Local Rules of the United States District Courts for Southern and Eastern Districts of New York, Laura Najemy hereby moves this Court for an Order for admission to practice *pro hac vice* to appear as counsel for Defendant Microsoft Corporation in the above-captioned action.

I am a member in good standing of the Bar of the Commonwealth of Massachusetts and there are no pending disciplinary proceedings against me in any state or federal court. I have never been convicted of a felony. I have never been censured, suspended, disbarred or denied admission or readmission by any court. I have attached an affidavit pursuant to Local Rule 1.3.

Dated: May 22, 2024

By: /s/ Laura Najemy

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